

Exhibit E

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VIA E-MAIL

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**Re: Plaintiffs' Second Request to the Underwriters for the Production of Documents in
*In re DiDi Global Inc. Securities Litigation, No. 1:21-cv-05807-LAK (S.D.N.Y.)***

Dear Larry:

We write in response to your October 4 letter about the Underwriter Defendants' July 5 Responses and Objections to Plaintiffs' Second Request for the Production of Documents from the Underwriter Defendants (the "Responses"). We believe that our positions in this letter resolve all outstanding issues for these Responses.

RFP No. 41. Plaintiffs' continued insistence on the Underwriter Defendants conducting a search for stabilizing transactions between June 28 and July 23, 2021, is puzzling. As stated in our September 11 and 25 letters, the Underwriter Defendants will produce documents responsive to RFP No. 41 for the period that our investigation indicates stabilizing transactions occurred—July 2 to July 7, 2021. We have repeatedly explained that we are not aware of any stabilizing transactions after July 7, but would inform you if we learned of stabilizing transactions outside of that period. That proposal more than satisfies the Underwriter Defendants' obligation to "conduct reasonable searches for documents responsive to discovery requests." *Solomon v. Fordham Univ.*, 2024 WL 3273112, at *10 (S.D.N.Y. July 2, 2024). Nonetheless, to settle this issue, the Underwriter Defendants will perform the search described in the Responses for the period from June 28 to July 23, 2021.

RFP No. 43. You continue to provide no basis for your speculation about unofficial communications between the Underwriter Defendants and investors. Nor have you offered any explanation why such communications, if they exist, would be relevant to Plaintiffs' claims against the Underwriter Defendants. We understand from your letter, however, that Plaintiffs are not seeking additional search terms to identify such communications and ask that the Underwriter Defendants confirm that they will not withhold such communications as nonresponsive. Given this clarification, the Underwriter Defendants will agree to produce non-privileged and non-PRC law protected documents, if any, reflecting communications between the Underwriter Defendants and investors in DiDi's IPO dated from February 1 to July 23, 2021, that are discovered in our review of the ESI from the 17 custodians of

the Underwriter Defendants ordered by the Court, after applying the search terms we previously offered and any others agreed upon by the parties.

Very truly yours,

/s/ Jonathan Rosenberg

Jonathan Rosenberg